

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

ROBERT COPLAN,  
MARTIN NISSENBAUM,  
RICHARD SHAPIRO, and  
BRIAN VAUGHN,

Defendants.

MOTION FOR ADMISSION  
OF PAULA JUNGHANS  
*PRO HAC VICE*

07 Cr. 453 (SHS)

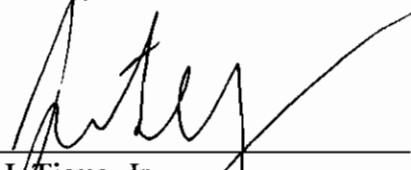
PLEASE TAKE NOTICE that, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, John J. Tighe, Jr., a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Paula M. Junghans  
Zuckerman Spaeder LLP  
1800 M Street, NW, Suite 1000  
Washington, DC, 20036  
Tel: 202-778-1850  
Fax: 202-822-8106  
E-Mail: [pjunghans@zuckerman.com](mailto:pjunghans@zuckerman.com)

Ms. Junghans is a member in good standing of the Bars of the District of Columbia and the State of Maryland. There are no pending disciplinary proceedings against Ms. Junghans in any State or Federal court.

Dated: June 20, 2007  
New York, New York

Respectfully submitted,



John J. Tigue, Jr.  
Morvillo, Abramowitz, Grand, Iason,  
Anello & Bohrer P.C.  
565 Fifth Avenue  
New York, NY 10017  
Phone: 212-856-9600  
Fax: 212-856-9494

To: Clerk of the Court  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Deborah E. Landis, Esq.  
Jaikumar Ramaswamy, Esq.  
Assistant U.S. Attorneys  
Southern District of New York  
One St. Andrew's Plaza  
New York, NY 10007

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305 Madison Avenue  
New York, NY 10165

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950 Third Avenue  
New York, NY 10022

Peter H. Barrett, Esq.  
Butler, Snow, O'Mara, Stevens  
& Cannada, PLLC  
P.O. Drawer 4248  
Gulfport, MS 39502

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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AFFIDAVIT OF JOHN J. TIGUE, JR.  
IN SUPPORT OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE*

07 Cr. 453 (SHS)

STATE OF NEW YORK :  
 : ss.:  
COUNTY OF NEW YORK :

John J. Tigue, Jr., being duly sworn, hereby deposes and says as follows:

1. I am a principal in the firm of Morvillo, Abramowitz, Grand, Iason, Anello & Bohrer P.C., attorneys for Defendant Richard Shapiro in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit Paula M. Junghans as counsel *pro hac vice* to represent Defendant Robert Coplan in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1967. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Paula M. Junghans since 1980.

4. Ms. Junghans is a partner in the firm of Zuckerman Spaeder LLP, in Washington, DC. She has tried numerous cases in federal courts through the United States, including the District of Maryland, the Eastern District of Virginia, the Eastern District of

Pennsylvania, the District of West Virginia, the District of Kansas, and the Eastern District of Tennessee. She is admitted to the United States Courts of Appeals for the Fourth, Fifth, Sixth and Tenth Circuits, the United States Tax Court, the Court of Federal Claims, and the United States Supreme Court, and is a fellow of the American College of Trial Lawyers and the American College of Tax Counsel. From 1998 to 2001, Ms. Junghans served as the Deputy Assistant Attorney General and the Acting Assistant Attorney General of the Tax Division of the United States Department of Justice.

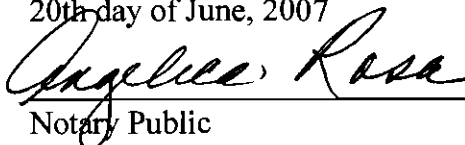
5. I have found Ms. Junghans to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure. Certificates of Good Standing from the Courts of Appeal of Maryland and the District of Columbia Bar are attached hereto as Exhibits A and B, respectively.

6. Accordingly, I am pleased to move the admission of Paula M. Junghans, *pro hac vice*.

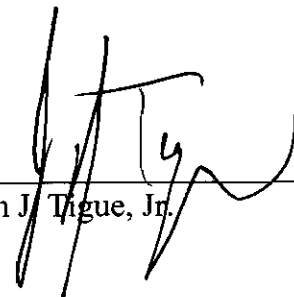
7. I respectfully submit a proposed order granting the admission of Paula M. Junghans, *pro hac vice*, which is attached hereto as Exhibit C.

WHEREFORE it is respectfully requested that the motion to admit Paula M. Junghans, *pro hac vice*, to represent Defendant Robert Coplan in the above-captioned matter, be granted.

Sworn to before me this  
20th day of June, 2007

  
Notary Public

ANGELICA ROSA  
Notary Public, State of New York  
No. 01R04620597  
Qualified in Queens County  
Commission Expires 11/30/2009

  
John J. Tighe, Jr.

**Court of Appeals  
of Maryland  
Annapolis, MD**



***CERTIFICATE OF GOOD STANDING***

*STATE OF MARYLAND, ss:*

*I, Alexander L. Cummings, Clerk of the Court of Appeals of Maryland,  
do hereby certify that on the twenty-ninth day of December, 1976,*

***Paula Marie Junghans***

*having first taken and subscribed the oath prescribed by the Constitution and  
Laws of this State, was admitted as an attorney of said Court, is now in good  
standing, and as such is entitled to practice law in any of the Courts of said  
State, subject to the Rules of Court.*

***In Testimony Whereof, I have hereunto  
set my hand as Clerk, and affixed the Seal  
of the Court of Appeals of Maryland, this  
fourteenth day of June, 2007.***

  
Clerk of the Court of Appeals of Maryland



**District of Columbia Court of Appeals**  
**Committee on Admissions**  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that


PAULA MARIE JUNGHANS

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was on the 2<sup>ND</sup> day of NOVEMBER, 2001  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on June  
13, 2007.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

ROBERT COPLAN,  
MARTIN NISSENBAUM,  
RICHARD SHAPIRO, and  
BRIAN VAUGHN,

Defendants.

ORDER ADMITTING  
PAULA JUNGHANS  
*PRO HAC VICE*

07 Cr. 453 (SHS)

Upon the motion of John J. Tigue, Jr., attorney for Richard Shapiro, and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Paula M. Junghans  
Zuckerman Spaeder LLP  
1800 M Street, NW, Suite 1000  
Washington, DC, 20036  
Tel: 202-778-1850  
Fax: 202-822-8106  
E-Mail: [pjunghans@zuckerman.com](mailto:pjunghans@zuckerman.com)

is admitted to practice *pro hac vice* as counsel for Robert Coplan in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: June \_\_\_\_, 2007  
New York, New York

\_\_\_\_\_  
United States District Judge

**CERTIFICATE OF SERVICE**

I, Kristy Watson Milkov, counsel for Richard Shapiro, do hereby certify that on June 20, 2007, I caused to be served a copy of the within Motion for Admission of Paula M.

Junghans *Pro Hac Vice* on the following attorneys by U.S. Mail.

Deborah E. Landis, Esq.  
Jaikumar Ramaswamy, Esq.  
Assistant U.S. Attorneys  
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Washington, D.C. 20036

  
Kristy Watson Milkov